UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
SUPERFUND DIVISION
1445 Ross Avenue
Dallas, Texas 75202-2733

December 13, 2018

Sent via Electronic Mail

Mr. Mark Paddack
Project Manager
EA Engineering, Science, and Technology, Inc., PBC
405 State Highway 121 (Bypass)
Building C, Suite 100
Lewisville, Texas 75067

Re: Comments on the Conceptual Site Model Technical Memorandum dated October 22, 2018 for the Lane Plating Superfund Site, Dallas, Texas
Cerclis ID TXN000605240.

Dear Mr. Paddack:

The U.S. Environmental Protection Agency (EPA), and the Texas Commission on Environmental Quality (TCEQ) have reviewed the Conceptual Site Model Technical Memorandum dated October 22, 2018 for the Lane Plating Superfund Site in Dallas, Texas. The EPA has the following comments.

Should you have any questions or concerns, please call me at 214-665-3198.

Sincerely,

Signed December 13, 2018

Kenneth Shewmake
Remedial Project Manager

cc: Rebecca Storms, TCEQ
Stephen Pereira, EPA
Vince Malott, EPA

General Comments:

1. Sections 7 and 8 describe work that would normally be done in the problem formulation and the exposure assessment portion of the human health and ecological risk assessments. The risk assessments will not be completed under phase one of this contract, but we asked for planning documents that anticipate work that will be done in phase 2. We will need to review and revise some of the assumptions made in sections 7 and 8 before completing the risk assessments. I think it would be helpful if we include a statement at the beginning of sections 7 and 8 explaining that the risk assessments will be conducted in phase two and that we will review the assumptions made in this document at that time.
2. Could we provide more information on the condition of the fences and if possible show the fences in figures?
3. Can we get a figure that shows the proximity to the school and other significant areas near the site?

Specific Comments:

4. **Section 3.2 and 3.4:** Need demographic information for the area near the site not for entire city of Dallas or Dallas county. I can provide additional data if needed.
5. **Section 3.5.3, last paragraph:** The site borders a park and an abandoned baseball field. Recreational uses need to be considered.
6. **Section 3.6, second paragraph in section, page 9:** The first sentence in the paragraph seems broken. Revise or breakup the sentence after "west side".
7. **Page 15, section 3.10:** State that we will evaluate type of habitat needed for the listed species and consult with the state and federal wildlife agencies to determine the final list of T&E species that will be evaluated in the risk assessment. We may need to consider surrogate species for evaluation in the ecological risk assessment. This will be done in phase two during the risk assessment.
8. **Section 4.4.3, Waste samples:** This data is useful for developing a COPC list, but we don't want to compare these results to soil benchmarks. The waste material should have been removed after it was sampled. Do not list COPCs from waste samples that are non-detect.
9. **Figure 2:** Please remove the name Lane from the Lane Residence and change the label nearest residence to residential area.
10. **Figure 4,6,7:** The figure does not show a lake, so this can be removed from the legend.
11. **Figure 10:** Be more specific on the primary sources. List historic plating operations, waste treatment or storage areas, sumps, and suspected dumping areas.
12. **Figure 10:** Be more specific on primary release mechanism. Include spills, leaks, discharge or dumping, and consider adding flooding with a release to offsite wetland areas.
13. **Figure 10:** The figure shows exposure to outdoor air particulates and VOCs is complete. Are we going to evaluate outdoor air? If not change to potentially complete or P.
14. **Figure 10:** We may want to put a note saying we will re-evaluate fish ingestion after determining the presence of catchable fish.
15. **Figure 12:** Show groundwater to surface water as potentially complete. We will need to determine if this pathway is complete.
16. **Figure 12:** Reptile amphibian dermal contact with surface water pathway is complete.

17. **Table 1:** Check mercury values in the table. The decimal may be in the wrong place.